

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

128 IMPORTS, INC., d/b/a 128 MAZDA-
OLDS-ISUZU, a Massachusetts corporation,

Plaintiff,

vs.

CIVIL ACTION

CASE NO. 1:05-cv-10523-NG

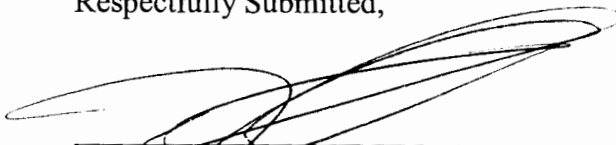
GENERAL MOTORS CORPORATION,
a Delaware corporation,

Defendant.

MOTION TO ADMIT PURSUANT TO LOCAL RULE 83.5.3(b)

Now comes the plaintiff, 128 Imports, d/b/a 128 Mazda-Olds-Isuzu, and moves to admit Richard N. Sox, Jr. and W. Douglas Moody, Jr., for the purposes of this case pursuant to Local Rule 83.5.3(b). Each of these attorneys certifies: (1) that he is a member of the Bar in good standing in each jurisdiction in which he is admitted to practice, (2) that there are no disciplinary proceedings pending against him as a member of the Bar in any jurisdiction, and (3) that he has read and is familiar with the Local Rules of this Court. See Certifications of Richard N. Sox, Jr. and W. Douglas Moody, Jr. attached as Exhibits A and B, respectively.

Respectfully Submitted,



Kevin C. Cain (Mass. Bar # 550055)

PEABODY & ARNOLD, L.L.P.

30 Rowes Wharf

Boston, MA 02110

Telephone (617) 951-2100

and

Robert F. MacDonald, Jr. (Mass. Bar # 660124)
BERSTEIN, SHUR, SAWYER & NELSON, P.A.
100 Middle Street, West Tower
Portland, Maine 04104
Telephone (207) 774-1200
Facsimile (207) 774-1127

and

Richard N. Sox, Jr. (Fla. Bar #982156)
W. Douglas Moody (Fla. Bar #301779)
MYERS & FULLER, P.A.
2822 Remington Green Circle
Tallahassee, Florida 32308
Telephone (850) 878-6404
Facsimile (850) 942-4869

ATTORNEYS FOR PLAINTIFF

Dated: May 10th, 2005

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing
pleading on all parties by mailing same, postage
prepaid, to all counsel of record.
Signed under the pains and penalties of perjury

DATED: 5/10/05



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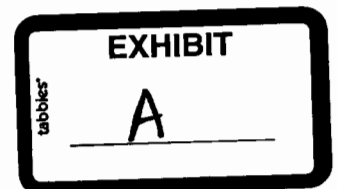
GENERAL MOTORS CORPORATION,
a Delaware corporation,

Defendant.

AFFIDAVIT OF ATTORNEY RICHARD N. SOX, JR.

The undersigned, being greater than eighteen (18) years of age and believing in the obligation of an oath, does depose and say:

1. I am an attorney with the firm of Myers & Fuller, P.A. of Tallahassee, Florida;
2. Our firm has an extensive nationwide practice primarily limited to the representation of motor vehicle dealers in disputes which arise between dealers and manufacturers;
3. I have a specialized skill and knowledge in such matters which are the subject of the complaint in the above-captioned action;
4. I am a member in good standing of the bar of the State of Florida and admitted to practice before the United States District Court, Northern, Southern and Middle District of Florida, as well as the District of Colorado, Northern and Central Districts of Illinois, Western District of Michigan, and U.S. Court of Appeals for the first and ninth circuits.
5. I have no grievance pending before me in any Court and I have never been reprimanded, suspended, placed on and active status, disbarred or resigned from the practice of law;



6. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts;



Richard N. Sox, Jr.

Subscribed and sworn to before me by Richard N. Sox, Jr., who is personally known to me, this 6th day of May, 2005.



Notary Public/My Commission Expires:



Supreme Court of Florida

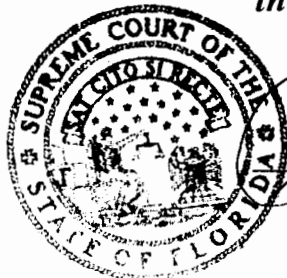
Certificate of Good Standing

I THOMAS D. HALL, Clerk of the Supreme Court of the State of Florida, do hereby certify that

RICHARD NEIL SOX, JR.

was admitted as an attorney and counselor entitled to practice law in all the Courts of the State of Florida on September 23, 1993, is presently in good standing, and that the private and professional character of the attorney appear to be good.

*WITNESS my hand and the Seal of the
Supreme Court of Florida at Tallahassee,
the Capital, this May 5, 2005.*



Thomas D. Hall
Clerk of the Supreme Court of Florida.

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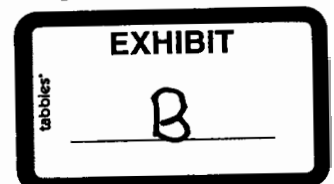
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Defendant.

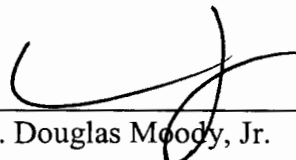
AFFIDAVIT OF ATTORNEY W. DOUGLAS MOODY, JR.

The undersigned, being greater than eighteen (18) years of age and believing in the obligation of an oath, does depose and say:


1. I am an attorney with the firm of Myers & Fuller, P.A. of Tallahassee, Florida;
2. Our firm has an extensive nationwide practice primarily limited to the representation of motor vehicle dealers in disputes which arise between dealers and manufacturers;
3. I have a specialized skill and knowledge in such matters which are the subject of the complaint in the above-captioned action;
4. I am a member in good standing of the bar of the State of Florida and admitted to practice before the United States District Court, Northern, Southern and Middle District of Florida, as well as the Central District of Illinois, Western District of Michigan, and U.S. Court of Appeals for the ninth and eleventh; U.S. Tax Court and U.S. Claims Court.
5. I have no grievance pending before me in any Court and I have never been reprimanded, suspended, placed on and active status, disbarred or resigned from the practice of law;

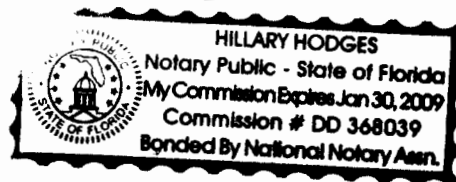


6. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts;


W. Douglas Moody, Jr.

Subscribed and sworn to before me by W. Douglas Moody, Jr., who is personally known to me,
this 6th day of May, 2005.


Notary Public/My Commission Expires:



Supreme Court of Florida

Certificate of Good Standing

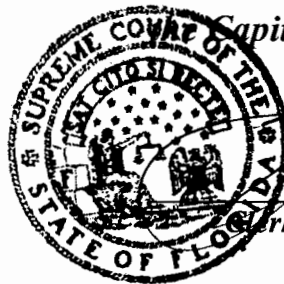
I THOMAS D. HALL, Clerk of the Supreme Court of the State of Florida, do hereby certify that

WALTER D. MOODY, JR.

was admitted as an attorney and counselor entitled to practice law in all the Courts of the State of Florida on September 18, 1980, is presently in good standing, and that the private and professional character of the attorney appear to be good.

*WITNESS my hand and the Seal of the
Supreme Court of Florida at Tallahassee,*

Capital, this May 5, 2005.



Thomas D. Hall
Clerk of the Supreme Court of Florida.